

220.15

Certifications Outside of Clinic

Introduction

This policy describes how an agency can certify a WIC participant outside of the normal WIC clinic setting. (Potential locations include pediatrician offices, hospitals, in home, etc.) This allows agencies with WIC CPAs who also work in other programs and are already going out to work with these participants through their participation in other programs, to also see them for WIC. This will increase the likelihood that participants are certified and provided with WIC benefits sooner and provide them with more timely breastfeeding education and support by reducing time and travel barriers for participants living in rural areas.

Note: The local agency's own policy will guide and address liability concerns related to home visits.

Option for local agencies

This is an option for local agencies. The local agency must ensure that staff documents their time spent doing each program's work so WIC is only charged for time that WIC services are being done.

Documentation of identity, physical presence, address and income

In order to comply with federal policy guidance, the intake process must be done via a phone interview with a WIC staff person and proofs of address and income sent electronically via text, email, or fax. Proofs submitted via electronic means, must be deleted immediately upon review.

Best practice would be to conduct the phone interview portion and have the participant submit their proofs electronically on the same day prior to starting the nutrition assessment component of the certification just as it would be done in clinic, but the intake interview can occur up to 30 days prior if needed.

Unless the participant meets the exception criteria for physical presence, physical presence at the nutrition assessment portion of the certification is required. Proof of identity and physical presence will be documented by the WIC CPA doing the nutrition assessment.

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Policy references

- Physical Presence at Certification (215.15)
- Documenting Proof of Income Sources (215.43)
- Residency Address Requirements (215.50)
- Identification Requirements (220.10)
- Issuing Food Instruments (225.50)
- Nutrition Education (240.30)

Introduction to Procedure

The certification procedure outside the normal WIC clinic follows the same steps as a certification at the WIC clinic except that the majority of the intake process is done via a phone interview with a WIC staff member that is not the one seeing the participant. The proofs of income and address are sent in electronically by the participant to be reviewed by the WIC staff person conducting the phone interview.

Procedure

The table below describes the procedure:

Step	Action	
1	Intake (Proof of Address, and Income) will be done via a phone interview with a WIC staff person. The proofs of each will be sent electronically via text, email or fax. (Proofs must be deleted immediately following the review.)	
	If....	Then...
	The participant submits their proofs via text, email, or fax	Create a new record date for each requirement and for each person being seen in the family's record in the data system.
	If the participant has their proofs but does not have the means to submit their proofs electronically	The WIC CPA going to see the participant can take photos of the participant's proofs and text or email them back to the WIC staff person who did the phone interview who will then update the record.
	Has their proof but is not income eligible	Issue a Notice of Ineligibility. See policy 215.08 for more information about issuing a Notice of Ineligibility vs. a Notice of Termination.
2	The second WIC staff person (the CPA) with the participant will complete the proof of identity and document physical presence before completing the certification appointment as normal including the nutrition interview and assessment, collection of anthropometric and hemoglobin data, nutrition education, and the creation and tailoring (as needed) of the WIC food package.	

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Procedures, continued

3	Have the participant review Your Rights and Responsibilities as a WIC Participant, and obtain the parent/guardian's signature.
4	<p>Issue benefits according to standard procedure.</p> <p><u>Note:</u> After the certification is complete either the CPA completing the certification or another WIC staff person could be called to issue the benefits remotely. If the certification is done while the participant(s) are still in the hospital the benefits will not be issued until the participant calls the agency and notifies them that they have been discharged.</p>
5	<p>If she is new to WIC:</p> <ul style="list-style-type: none">• Provide education about how to use the eWIC card,• Review use of the WIC shopper app so the participant would have immediate access to their food benefit list• Provide the WIC Approved Foods booklet, a list of vendors in the area, and• Issue the eWIC card. <p><u>Note:</u> See policy 215.85 for more information on New Participant Education</p>
6	Schedule the family's next appointment.
7	Ask if she would like a copy of her family's food benefit list mailed to her along with the appointment reminder.

Disaster Situations

There may be circumstances when disaster prohibits participants or staff from visiting a clinic or creates a shortage in the clinic. In these situations, staff may complete WIC appointments remotely from their home via telephone or virtual technologies such as telehealth or mobile apps. If your agency has procedures in place, it is allowable for staff to serve participants remotely from their home.

Procedures for completing appointments

The State office will provide guidance on how to serve participants when they are not physically present.

Confidentiality

Per 7 CFR 246.26 (d)(1)(i), applicant and participant confidentiality must be maintained no matter how the information is provided. Contractors and their subcontractors shall comply with USDA and Department policies and procedures to protect client confidentiality and assure security of the client information, including electronic files.

Security

Security requirements for equipment and applications used must meet requirements in the local agency's contract.